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10 Attorneys for Plaintiff
11 Shoreline Capital Management, Ltd.

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN JOSE DIVISION

15 SHORELINE CAPITAL MANAGEMENT,
16 LTD., a British Virgin Islands company
17 limited by shares,

18 Plaintiff,

19 vs.

20 XIAOBING SUN, an individual, also
21 known as DANIEL SUN,

22 Defendant.

No. JW CV 08 0121

DECLARATION OF YAN WEN
SUPPORTING *EX PARTE* APPLICATION
FOR TRO AND OSC RE PRELIMINARY
INJUNCTION, AND FOR ORDER
GRANTING LEAVE TO CONDUCT
EXPEDITED DISCOVERY

23 I, Yan Wen, say:

24 1. I am an employee of Guangzhou United (GU), the onshore
25 agent of Shoreline Capital Consulting (Shenzhen) Co., Ltd. (Shoreline Shenzhen), the
26 wholly-owned subsidiary of Shoreline Capital Management, Ltd. (Shoreline) that is
27 the Plaintiff in this action. GU's agency contract with Shoreline Shenzhen is for the
28 sole purpose of employing Shoreline personnel and it is 100% funded by
Shoreline. I have personal knowledge of the matters set forth in this Declaration and
would competently testify to them if called as a witness.

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2 2. As a member of the deal sourcing team at Guangzhou United,
3 a Shoreline China firm, I have become acquainted with the employees of the four
4 primary asset management firms from whom we buy debt portfolios. Once such seller
5 is Huarong Asset Management Company (Huarong). In my contacts with Huarong, I
6 have met with Huarong's District Supervisory, Mr. Shuikang Sun.

7 3. Not long after August 15, 2007, Deguang Zheng, another
8 employee of Guangzhou United, a Shoreline China firm, and I visited Shuikang Sun
9 in his office at Huarong to discuss a potential investment we were considering buying
10 from Huarong. Shuikang Sun informed us that our colleague, Mr. Xiaobing Sun had
11 called him on August 15, 2007 and solicited a meeting to discuss potential deals.
12 Shuikang Sun told us that Xiaobing Sun told him on the phone that he was with
13 Shoreline or Guangzhou United and so Shuikang Sun agreed to the meeting. Shuikang
14 Sun informed us that Xiaobing Sun attended the meeting with another former
15 Shoreline employee named Jianping Zhou and arranged to begin due diligence on a
16 potential portfolio of loans for investment. After the meetings, Mr Zhou and Xiaobing
17 Sun told him that they were not with Shoreline and Guangzhou United anymore and
18 handed Mr Shuikang, Sun a business card with a different company's name on it.

19 I declare under penalty of perjury under the laws of the United States that the
20 foregoing is true and correct.

21 Executed this 19th day of January, 2008 at Guangzhou, China.

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23 
24 Yan Wen

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